

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CLYDE E. MEASE, JR.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 06-271-SLR
v.	)	
	)	
WILMINGTON TRUST COMPANY	)	Trial By Jury Demanded
	)	
Defendant.	)	

TO: Sheldon N. Sandler, Esquire  
Young, Conaway, Stargatt & Taylor  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899

**NOTICE OF DEPOSITION DUCES TECUM<sup>1</sup>**

**PLEASE TAKE NOTICE**, that the undersigned will take the oral deposition of Tom Davidson on June 23, 2008, beginning at 10:00 a.m. at the offices of Aber, Goldlust, Baker & Over, located at 702 N. King Street, Suite 600, Wilmington, DE 19801.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber  
GARY W. ABER (DSB #754)  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899  
302-472-4900  
Attorney for Plaintiff

DATED: June 17, 2008

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<sup>1</sup>The deponent is to bring with him all documents listed on Exhibit "A", attached hereto.

## **EXHIBIT A**

1. All documents or emails mentioning, relating to, or pertaining to complaints concerning Clyde Mease, forwarded to Tom Davidson for investigation.
2. All documents or emails mentioning, relating to, or pertaining to complaints concerning Clyde Mease, reviewed by Tom Davidson, for each of the complaints contained in any document in No. 1 above.
3. All documents or emails sent by Tom Davidson to any other person inquiring as to facts or circumstances surrounding the complaints, concerning Clyde Mease.
4. All documents or emails received by Tom Davidson from any other person concerning complaints as to Clyde Mease, other than those referred to in No. 1 above.
5. All documents or emails sent by Tom Davidson to any person concerning any preliminary findings, and responses thereto from any person concerning Clyde Mease.
6. All documents or emails which result in or constitute final reports and/or findings concerning complaints made about Clyde Mease.
7. All documents or emails sent to any person after the documents in No. 6 were written, containing information or relating facts or conclusions concerning the findings of Tom Davidson's investigation.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that two copies of the attached pleading was served via electronic mail on June 17, 2008 to the following counsel:

Sheldon N. Sandler, Esquire  
Young, Conaway, Stargatt & Taylor  
1000 West Street, 17th Floor  
P.O. Box 391  
Wilmington, DE 19899

/s/ Melissa A. Chionchio

Melissa A. Chionchio  
Secretary to Gary W. Aber, Esquire